

In the Matter of:

MCDOUGLE

vs.

NESHOBA COUNTY, MS, et. al.

MICHAEL W. MCDOUGLE

July 5, 2016



Court Reporting Solutions

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EXHIBIT "C"

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THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

BRITTNEY MCDOUGLE, INDIVIDUALLY, AND
ON BEHALF OF THE HEIRS AND WRONGFUL.
DEATH BENEFICIARIES OF MICHAEL D.
MCDOUGLE, SR., DECEASED PLAINTIFF

VERSUS CIVIL ACTION NO:3:15CV350-CWR-FKB

NESHOBA COUNTY, MS, SHERIFF TOMMY WADDELL,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
CITY OF PHILADELPHIA, MS, CHIEF GRANT MEYERS,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
AND OFFICERS BRAD CROCKETT, ERIC LOWNDES,
BRAD POE, AND "JOHN DOES 1-6", ALL IN THEIR
INDIVIDUAL AND OFFICIAL CAPACITIES DEFENDANTS

DEPOSITION OF MICHAEL W. MCDOUGLE

APPEARANCES NOTED HEREIN

DATE: JULY 5, 2016
PLACE: LAW OFFICES OF MIKE WHITE
501 MAIN STREET
PHILADELPHIA, MISSISSIPPI
TIME: 12:55 P.M.

REPORTED BY: DEBORAH H. NELSON
CSR #1256

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9 OTHERS PRESENT:

10 Ms. Brittney McDougale (portion of depo)

11 Ms. Mary Helen McDougale (portion of depo)

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1 anywhere?

2 A Neshoba General Hospital.

3 Q What does she do there?

4 A She was a dietary supervisor.

5 Q Okay. Is that still what she does now?

6 A Oh, I really -- I mean, the job what I see
7 on her badge, that's what it say. I don't know. I
8 don't go down there.

9 Q Okay.

10 A I don't know what she really do. I don't
11 ask. As long as I know she's got a job.

12 Q Okay. How long has she been working
13 there?

14 A Probably 17 or 18 or 19 years. I don't
15 know. It's been a long time.

16 Q All right. All right, let me ask you
17 about your son. Was he employed at the time of his
18 death back in November 2014?

19 A No.

20 Q When was the last time he worked anywhere?

21 A I really can't say, sir. To keep from
22 telling you a story, I really can't say. I mean he
23 was 21 years old. I didn't have no reason, none
24 whatsoever, to try to figure out, you know, why he
25 wasn't working or why nobody wasn't hiring him or